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Services: The Vanishing Opportunity

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The Canadian government's introduction to the chapter on services states that trade in services represents the frontier of international commercial policy, because dynamic economies are increasingly dependent on the wealth generated by service transactions. This is true. The service sector is the major source of wealth and employment in all industrial countries. Canada is no exception to this international trend: services generate about two-thirds of the national income and provide 70 per cent of the jobs.

The unusual feature about Canada's service economy is that, unlike most other industrialized nations, Canada is not a major exporter of services. For the past thirty years this country has experienced a trade deficit in services which has been growing at an alarming rate. The contrast with the U.S. is startling. American service firms are truly dominant in international trade, accounting for about one-fourth of the entire world trade in services. Since its service sector is the only one that consistently generates a trade surplus, the U.S. government has been eager to ensure that its services trade expands internationally.

Expansion requires not only increasing the export of services from the U.S., but also creating conditions so that American firms can easily invest in service industries in other countries. Some services, such as day-care, educational services, and services related to goods production, simply cannot be carried out across borders. Since this type of

trade accounts for the major source of service revenue, the right to provide services within other countries is recognized in the U.S. as critical for improving balance of trade problems. Therefore, the American agenda in international trade includes improving the ability to invest in foreign countries in order to deliver services within those countries, and the creation of clear rules about how firms who deliver these services will be treated.

Investment in services is the true frontier for international investment, and can be seen as offering the same attraction that American investment in the resource and manufacturing sectors has historically provided. With the drop in world prices for resources and increased global competition in manufacturing, resource and manufacturing investment opportunities in Canada have become less lucrative for American firms. In contrast, the tremendous expansion of the Canadian service market and the opportunities for penetrating that market, have made the service sector increasingly attractive.

Over the past few decades, the ability of large multinational companies to provide services globally has expanded enormously. But the problem for them is that they are increasingly faced with trade restrictions as countries try to protect their own industries and maintain control over their economics. Many countries vehemently oppose free trade in services because it threatens control over the infrastructures of their own economies - particularly in areas as vitally important as banking, investment, insurance, transportation, telecommunications, social services, and culture.

The U.S., at the urging of giant American service firms like American Express, American Telephone and Telegraph, the American International Group and Citibank, has repeatedly tried to include free trade in services in international trade agreements, such as the General Agreement on Tariffs and Trade (GATT). Although in the past this campaign has had little success, free trade in services will be an important issue in the Uruguay Round of GATT. According to a congressional report published in July 1987, the U.S. has three objectives in GATT relating to services. These are, first, that "national treatment" should govern services trade. This means foreign firms should be treated in the same manner as are domestic firms. Second, the U.S. wants "transparency" in regulations and barriers that affect services trade. This means that all new regulations made by a country regard-

ing services should explicitly state the impact they will have on trade. The third objective is that all trade agreements include a disputes-settlement mechanism which will relate specifically to services.' The report goes on to say that the U.S. has made reductions in barriers to services trade a primary goal in the Uruguay Round of GATT: "Although immediate payoffs in terms of U.S. jobs and U.S. exports will be small, the *long-run strategic importance of services makes the goal a vital one*. [emphasis in the original] ,2

During the Canada-U.S. trade talks, Canadian negotiators paid amazingly little attention to the implications of free trade in services and the problems this would cause Canada. In the agreement the U.S. has received extraordinary concessions from Canada in the area of services - concessions which go considerably beyond those the U.S. is pushing for, and certainly beyond what it expects to achieve in the Uruguay round of GATT negotiations. This agreement is the first comprehensive agreement in services ever negotiated.

The Agreement

Chapter 14 of the agreement applies to 299 service industries (see Appendix); however, services are also covered in other sections of the agreement, most notably the chapters which cover investment, temporary entry for business-persons, financial services, and institutional provisions, and also the articles in Chapter 20 (Other Provisions) which deal with monopolies, cultural issues, and nullification and impairment.

As the government's introduction to the chapter on services indicates, the issue is "more than a matter of opening up service markets." Its point is that trade in services is an integral part of trade in goods since services are related to the production, sale, distribution, and maintenance of goods. Therefore, in order to increase trade in tangible items, their servicing needs to be included in trade agreements. But the matter of opening up service markets is also more than simply identifying services as an adjunct to the goods-producing sector. They are a big business in their own right and some services, particularly social services, are quite distinct from their relationship to trade in goods.

The government, in its introduction, maintains that "basic economic efficiency and competitiveness gains expected. from the removal of barriers to trade in goods between Canada and the United States also apply to the service sectors." This is an assertion which has not been demonstrated by any studies. The effect of increased competition in services has been virtually ignored and no specific study of any industry indicates that Canada's export performance can improve once barriers to trade in the covered industries are removed. Considering the seriousness of Canada's international indebtedness, the deterioration of our service account with the U.S., and the very fragile nature of our service exports, pursuing a free-trade agreement in services without any real examination of its impact seems foolhardy.

A most serious consequence of the agreement will be the inability in the future to introduce protection of our service industries should the optimistic predictions of the government not materialize. This agreement weakens the ability to introduce any new national policies for services.

National Treatment

The chapter on services opens up enormous privileges for the services industries covered under the agreement. These privileges include the right to invest; the right to produce, distribute, sell, market and deliver a service; the right to use domestic distribution systems; and the right to establish a commercial presence.

Article 1402:8 specifies that foreign firms must receive treatment from a province or a state "no less favourable than the most favourable treatment accorded by such province or state." This means that American firms must be given the same treatment as Canadian firms with respect to taxes, laws, regulations and requirements. The provision extends beyond the "national treatment" principle in that it involves provincial treatment as well. The agreement insists that provinces must treat American firms as they do any other firm in the province.

The result of this provision will be to introduce peculiar anomalies in Canada. Provinces may continue to discriminate against Canadian service firms located in another province while being forced to treat American firms as if they were local provincial enterprises. With this

agreement, U.S. firms will have increased access to provincial markets in all cases - rights which are not accorded to other Canadian firms.

The right of national treatment does not apply only to American firms which are located in Canada. The agreement (Article 1402.8) states that "neither Party shall introduce any measure, including a measure requiring the establishment or commercial presence by a person of the other Party in its territory as a condition for the provision of a covered service." This means that for the almost three hundred service industries covered in Chapter 14, American firms must be treated as are Canadian firms, *even if they are not located in this country*. This provision could result in serious job losses in industries where services can be provided from entirely outside the country.

Disputes-Settlement Mechanism for Services

The agreement provides a binding mechanism for settling disagreements about trade in services. This is one area where rules are new and binding, unlike disputes over trade in goods. Yet, ironically, it is also an area where a genuine, binding disputes-settlement mechanism will definitely work against Canada.

Discussion of disputes settlement has centred on how effective the new binational panels will be in helping Canadian exporters fight anti-dumping and countervailing duty cases. Since the disputes-settlement mechanism outlined in Chapter 19 of the agreement does nothing to change the impact of U.S. trade-remedy law, that mechanism is ultimately not going to be very important (see chapter four). In contrast, the disputes-settlement mechanism for services is truly significant.

To date there has been no clear way to resolve disputes which involve services which are not traded across borders, but which are delivered domestically by a foreign-owned company. Existing trade-remedy legislation applies only when cross-border trade occurs. When American firms operating in Canada have experienced some sort of trade barrier here, there has not been any clear and strong mechanism to deal with these companies' complaints. Section 301 of the U.S. Trade Act of 1974 is technically able to remedy foreign government practices which affect the competitiveness of American service firms in foreign markets. However, the U.S. has rarely used section 301 provisions and it would find it difficult to retaliate against what it per-

ceives to be unfair practices in services because there has been no agreement about what constitutes fair or unfair trade practices in services.

Now, with the free-trade agreement, clear rules are established. The institutional mechanism of Chapter 18, which provides for binding arbitration, ensures that these rules would be enforced. In essence, the disputes-settlement mechanism for services protects the American service sector in the same way that the manufacturing and resource sectors are protected by U.S. trade-remedy legislation. Indeed, it is a heightened form of American protectionism - one that will apply within our border! While technically the same measures will be available to Canadian service firms operating in the U.S., the balance is tipped dramatically in favour of American service firms, since the Canadian presence in the American service sector is negligible.

Social Services

There are a great many ways that social services will be affected by the agreement, contrary to the government's assertion in the introduction to the chapter on services that "doctors, dentists, lawyers, childcare and government-provided services (health, education and social services)" are excluded from the agreement. Even within that same chapter they are explicitly *included*.

The agreement lists the covered services by their Standard Industrial Classification Numbers, not by name. The kinds of services covered include post-secondary non-university education and health and social service industries (Divisions O and P of Appendix). While the chapter on services extends free trade to the management of institutions such as hospitals, homes for children, ambulance services, and health clinics, this is not the only part of the agreement which rules on these services - the chapter on investment also extends right of establishment and right of national treatment to all aspects of these industries. The effect of free trade, then, is not just increased American access to the management of social service industries, but also to the ownership of them. So, for example, while the services chapter gives a Canadian ambulance service the right to manage this industry in Canada, the chapter on investment also permits the American firm to own the industry here.

The full implication of these provisions will undoubtedly take considerable time to understand and will probably only be resolved through legal challenges to the agreement. It could be argued, for example, that any government capital grants to establish health or social institutions would have to be also open to American firms, if they are available to non-government institutions. This is especially important in areas where government supports non-profit private services, such as nursing homes, day-care, and hospitals. Since there is no specific clause which allows a distinction between governments' treatment of profit and non-profit industries, under the deal no government will be able to favour non-profit industries in health and social services if American firms choose to operate in Canada. Thus, although health and social services are a provincial responsibility, the power of provincial governments to pursue social policies of their own design will be seriously limited by this agreement.

Provincial power regarding social services will also be affected by the section of the agreement which covers monopolies (Article 2010). This is an extremely powerful article which, in practical terms, will make it virtually impossible to extend public provision of services into any areas which are now in the private sector.

While formally recognizing the prerogative of governments to maintain or designate a monopoly, the restrictions on their ability to do so are enormous. Before Canada can designate a monopoly (such as public dental care or auto insurance) the U.S. must be notified and consulted about the way in which this will occur. Canada would also be required to "endeavour to introduce such conditions on the operation of the monopoly as will minimize or eliminate any nullification of impairments of benefits under this Agreement" (Article 2010.2b). Here is where the very powerful section on "Nullification and Impairment" (Article 2011) takes effect. This section says that if any action occurs which affects a benefit a firm would reasonably expect to receive, "whether or not such a measure conflicts with the provisions of this Agreement," the issue would be resolved through the disputes-settlement mechanism which could ultimately lead to binding arbitration. So, for example, an American insurance company which is unhappy with the idea of losing its lucrative auto insurance market in Canada could challenge any move on the part of a provincial government to introduce a public insurance plan, since this would obviously

conflict with benefits the Americans expect to receive by being in Canada.

But, even if the American challenge was defeated, there would still be another problem. American firms would have to be provided with "prompt, adequate and effective compensation" (Article 1605) for whatever losses they would expect to incur. This is not a minor issue. In most cases it would involve costs so great as to make impossible the whole attempt toward increasing public involvement in the provision of public services.

In most cases, Canadian social services are superior to American social services. Canadian systems of health care, for instance, cost less and cover more people than the more privatized American system. Yet under the deal, the Canadian public would have to compensate the American private sector providers of services before introducing more efficient public services. Ultimately, the cost of compensating the private producers would price publicly delivered, universal social services out of the market. No new initiatives for services (such as public dental care) would be possible under free trade.

Although the agreement makes it impossible to bring more social services into the public sector, its provisions make it extremely easy for public services to be increasingly privatized. Clearly, the right of national treatment will make Canada very attractive for American social service investors. But equally significant are the cost pressures provincial governments face in providing these services. As federal transfer grants cover a smaller and smaller proportion of the total costs of providing social services, provincial governments attempt to solve their problems by involving the private sector. This usually results in the private provision of a service (such as nursing homes and day care) which is either partially or fully funded by taxpayers. Public funds, then, support social services operating for profit. The result is usually a deterioration in the quality of the service provided, since a considerable portion of public funding goes, not to the service itself, but toward providing profits for the private provider.

Rules of Origin

This agreement does not require that services imported into Canada be mainly produced in the U.S. in order for American service firms to

receive benefits of the agreement. This is in stark contrast to the rules of origin provisions for goods which require that at least 50 per cent of the value of goods exported must be produced in the exporting country. Having rules about where items are produced prohibits firms from shifting production to low-cost places and admitting them into our free-trade area. The implications for goods-producing industries are clear - if most of the production of an item could take place off-shore, in countries where labour costs are substantially lower, and then the product could be re-shipped to Canada by American fines, the price of the item could clearly be much lower, and Canadian firms would be at a terrific disadvantage.

The same danger applies to production of services. There are no rules in the agreement about what proportion of a service can be produced in a third country in the agreement. While the agreement permits benefits to be denied if a third country is involved, there is no indication of just what constitutes third-country involvement (Article 1406). Also, benefits can only be denied "subject to prior notification and consultation," and the onus is on the country denying benefits to establish proof that an unacceptable activity is taking place.

The result of having no clear rules of origin provisions could be dramatic. Data processing, for example, could be done in the Caribbean and exported by American firms to Canada. This would escalate the importation of very cheap data processing in Canada and result in dramatic job losses in the clerical sector.

Telecommunications

The United States is pursuing an aggressive approach toward free trade and policy harmonization in the telecommunications industry. The deregulation of the communications industry within the U.S. has resulted in serious trade problems for that country. While the American market has become more open to the rest of the world as a result of divestiture and deregulation, American firms face restrictions in the markets of many of their competitors. Deregulation, consequently, has not been a happy experience in the U.S. The push towards international free trade in telecommunications by the U.S., and the consequent "harmonization" of policy to provide a "level playing field," is

an attempt to rectify domestic problems caused by deregulation by exporting them.

Telecommunications used to mean local and long-distance telephone calls. It is now a much broader industry and includes all electronic transmission of information, including computer services. In 1979 a Canadian government commission (commonly known as the Clyne Commission) investigated the problems of international trade in telecommunications. It called for increasing protection for the industry to avoid greater dependence on American provision of these services, saying that this trend posed "the most dangerous threat to Canadian sovereignty, in both its cultural and commercial aspects.'

The danger areas arising from the greater use of foreign telecommunications services identified by the commission are as follows: reduced Canadian power to ensure protection for privacy, confidentiality, and crime; reduced control over disruptions resulting from breakdown; loss of control over companies operating in Canada which store and process their data in the U.S.; increased influence of American databanks emphasizing American values, goods and services; and increased ability of the U.S. to make its laws applicable outside U.S. territory.⁶

To deal with these dangers, the commission recommended a comprehensive telecommunications strategy for Canada which would include requirements that data processing related to Canadian business operations be performed in Canada, and that the exporting of client data for processing and storage abroad (as now exists with regard to banking data) in information sensitive industries (such as the insurance and loan industries) be prohibited.

The free-trade deal has ignored, rather than addressed, the dangers of trade liberalization in communications. Moreover, since it is a comprehensive agreement, it would prevent any further consideration of these dangers at any time in the future. The agreement covers all computer services and telecommunications with the exception of basic telecommunications networks (local and long-distance telephone service). The objective is to "maintain and support the further development of an open and competitive market" (Annex 1404.C1).

American telecommunications companies will have all the same rights of establishment and national treatment as other industries covered in the chapter on services. In addition, they are given access

to all telecommunications networks in such a way that, for instance, private lines will be able to acquire flat-rate private-line services (which offer big volume users of telephone services a substantial advantage in costs) and resell them. At the moment, the use of private lines for the development of intercorporate networks is allowed, but the resale of the service is not. Telephone companies providing basic service have been discontented with the flat-rate provision because payments are not related to volume. This leaves them with telephone networks that are losing business to the private line firms which are getting the lucrative end of the market. Their concern has obviously been ignored in the free-trade agreement, which would allow the private sale of huge volumes of telecommunication services.

The agreement places no restrictions on the "movement of information across the borders and access to data bases or related information stored, processed or otherwise held within the territory of a Party" (Annex 1404.C3f). Currently, there are restrictions on cross-border data flows; some of them are substantial and involve tax regulations and outright prohibitions against the processing and storing of data outside the country. These have been instituted for reasons of privacy and security, but the effect has also been important for retaining a substantial number of jobs in Canada.

While there has been a significant shift toward greater amounts of Canadian data being processed in the U.S., resulting in large job losses, some important protections remain.⁷ The most significant is the Bank Act, which requires that all banking data be processed and stored in Canada. American firms have long maintained that the Bank Act is an unfair barrier to trade. According to the American journal *Inside U.S. Trade*, the provision on data processing in the free-trade agreement is very important and is "a significant precedent in our efforts in the Uruguay Round to achieve a similar multilateral understanding." The journal notes that the removal of data restrictions in the Bank Act was not included in the agreement, but it feels that this issue would soon be cleared up. As it points out, "the services code allows for future negotiations to remove barriers and we have a process to deal with these isolated restrictions."

Conclusion

The services provisions in the agreement are in the process of being extended. Article 1405 explicitly states that the U.S. and Canada will work to eliminate existing measures inconsistent with the intent of the agreement, to include other industries in the sectoral annexes, and to consult periodically for the purpose of including additional services and identifying further opportunities for increasing access to each other's service markets. Whatever industries have escaped the current round of negotiations will have little protection when the spotlight is off the agreement. So services, such as postal services and transportation, which had been included in negotiations but did not make it to the final text, will undoubtedly be major targets in the future. The intention of the agreement is clear - to integrate the service sectors of the two nations.

With international trade in services expanding rapidly, rules about international competition are essential. In negotiating with the U.S., Canada has been at an extreme disadvantage. The government has little understanding of the true significance of the service sector in generating wealth and income in this country, and even less understanding of the impact of increased American penetration in our service markets. Canada would be in a much stronger position in bargaining with the U.S. if we showed solidarity with other smaller nations in negotiating through GATT. While we would undoubtedly face the might of the U.S. in this arena as well, we would be doing it with allies who recognize the dangers of unrestricted free trade in services. The bilateral agreement with the U.S. is a massive and unthinking abandonment of control over our service industries.

Appendix

Services listed in the agreement, by Standard Industrial Classification numbers

Division A - Agricultural and Related Service Industries
 0122 Farm Animal Breeding Services (Except Poultry)
 0121 Poultry Services
 0219 Other Services Incidental to Livestock and Animal Specialties
 0221 Soil Preparation, Planting and Cultivating Services
 0222 Crop Dusting and Spraying Services
 0223 Harvesting, Baling and Threshing Services
 0229 Other Services Incidental to Agricultural Crops
 Division C - Logging and Forestry Industries
 0511 Forestry Services Industry
 Division D - Mining (Including Milling), Quarrying and Oil Well Industries
 0911 Contract Drilling Oil and Gas Industry
 0919 Other Service Industries Incidental to Crude Petroleum and Natural Gas
 0921 Contract Drilling Industry (Except Oil and Gas)
 0929 Other Service Industries Incidental to Mining Construction Industry
 Division
 4011 Single Family Housing
 4012 Apartment and Other Multiple Housing
 4013 Residential Renovation
 4021 Manufacturing and Light Industrial Building
 4022 Commercial Building
 4023 Institutional Building
 4111 Power Plants (Except Hydroelectric)
 4112 Gas, Oil and Other Energy Related Structures (Except Pipelines)
 4113 Gas and Oil Pipelines
 4119 Other Industrial Construction
 4121 Highways, Streets and Bridges
 4122 Waterworks and Sewage Systems
 4123 Hydroelectric Power Plants and Related Structures (Except Transmission Lines)
 4124 Power and Telecommunication Transmission Lines
 4129 Other Heavy Construction
 4211 Wrecking and Demolition
 4212 Water Well Drilling
 4213 Septic System Installation
 4214 Excavating and Grading
 4215 Equipment Rental (With Operator)
 4216 Asphalt Paving
 4217 Fencing Installation
 4219 Other Site Work
 4221 Piledriving Work
 4222 Form Work
 4223 Steel Reinforcing
 4224 Concrete Pouring and Finishing
 4225 Precast Concrete Installation
 4226 Rough and Framing Carpentry
 4271 Plastering and Stucco Work
 4272 Drywall Work
 4273 Acoustical Work
 4274 Finish Carpentry
 4275 Painting and Decorating work
 4276 Terrazzo and Tile Work
 4277 Hardwood Mooring Installation
 4278 Resilient Flooring and Carpet Work
 4279 Other Interior and Finishing Work
 4291 Elevator and Escalator Installation
 4292 Ornamental and Miscellaneous Fabricated Metal Installation
 4293 Residential Swimming Pool Installation
 4299 Other Trade Work n.e.c.
 4411 Project Management, Construction
 4491 Land Developers
 4499 Other Services Incidental to Construction n.e.c.
 Division G - Transportation and Storage Industries
 4599 Other Service Industries Incidental to Transportation n.c.c. (packing and crating)
 Division I - Wholesale Trade Industries
 5111 Petroleum Products, Wholesale
 5211 Confectionary, Wholesale
 5212 Frozen Foods (Packaged), Wholesale
 5213 Dairy Products, Wholesale*
 5214 Poultry and Eggs, Wholesale
 5215 Fish and Seafood, Wholesale
 5216 Fresh Fruit and Vegetables, Wholesale
 5217 Meat and Meat Products, Wholesale
 5219 Other Foods, Wholesale
 5221 Beverages, Wholesale
 5213 Drugs, Wholesale

5232 Toilet oaps and Preparations,
 5239 Drug Sundries and Other Drugs and Toilet Preparations, Wholesale
 5241 Tobacco Products, Wholesale
 5311 Men's and Boys' Clothing and Furnishings, Wholesale
 5312 Women's Misses' and Children's Outerwear, Wholesale
 5313 Women's Misses' and Children's Hosiery Underwear and Apparel Accessories, Wholesale
 5314 Footwear, Wholesale
 5319 Other Apparel, Wholesale
 5321 Piece Goods, Wholesale
 5329 Notions and Other Dry Goods, Wholesale
 5411 Electrical Household Appliances, Wholesale
 5412 Electronic Household Appliances, Wholesale
 5421 Household Furniture, Wholesale
 5431 China, Glassware, Crockery, and Pottery- Wholesale
 5432 Floor Coverings, Wholesale
 5433 Linens, Draperies and Other Textile Furnishings, Wholesale
 5439 Other Household Furnishings, Wholesale
 5511 Automobiles, Wholesale
 5512 Trucks and Buses, Wholesale
 5519 Other Motor Vehicles and Trailers, Wholesale
 5521 Tires and Tubes, Wholesale
 5529 Other Motor Vehicle Parts and Accessories, Wholesale
 5611 Iron and Steel Primary Forms and Structural Shapes, Wholesale
 5612 Other Iron and Steel Products, Wholesale
 5613 Non-Ferrous Metal and Metal Products, Wholesale
 5619 Combination Metal and Metal Products, Wholesale
 5621 Hardware, Wholesale
 5622 Plumbing, Heating and Air Conditioning Equipment and Supplies, Wholesale
 5631 Lumber, Plywood and Millwork, Wholesale
 5632 Paint, Glass and Wallpaper, Wholesale
 5639 Other Building Materials, Wholesale
 5711 Farm Machinery, Equipment and Supplies, Wholesale
 5721 Construction and Industrial Machinery, Equipment and Supplies, Wholesale
 5722 Mining Machinery, Equipment and Supplies, Wholesale
 5731 Industrial Machinery, Equipment and Supplies, Wholesale
 5741 Electrical Wiring Supplies and Electrical Construction Material, Wholesale
 5742 Electrical Generating and Transmission Equipment and Supplies, Wholesale
 5743 Electronic Machinery, Equipment and Supplies, Wholesale
 5949 Other Electrical and Electronic Machinery, Equipment and Supplies, Wholesale
 5791 Office and Store Machinery, Equipment and Supplies, Wholesale
 5792 Service Machinery, Equipment and Supplies, Wholesale
 5793 Professional Machinery, Equipment and Supplies, Wholesale
 5799 Other Machinery, Equipment and Supplies n.e.c., Wholesale
 5911 Automobile Wrecking
 5919 Other Waste Materials, Wholesale
 5921 Newsprint, Wholesale
 5922 Stationery and Office Supplies, Wholesale
 5929 Other Paper and Paper Products, Wholesale
 Agricultural Feeds, Wholesale
 5932 Seeds and Seed Processing, Wholesale
 5939 Agricultural Chemical and Other Farm Sues, Wholesale
 5941 Toys, Novelties and Fireworks, Wholesale
 5942 Amusement and Sporting Goods, Wholesale
 5951 Photographic Equipment and Supplies, Wholesale
 5952 Musical Instruments and Accessories, Wholesale
 5961 Jewellery and Watches, Wholesale
 5971 Industrial and Household Chemicals, Wholesale
 5981 General Merchandise, Wholesale
 5991 Books, Periodicals and Newspapers, Wholesale
 5992 Second-Hand Goods, Wholesale (Except Machinery and Automotive)
 5993 Forest Products, Wholesale
 5999 Other Products n.e.c., Wholesale
 Division J - Retail Trade Industries
 6011 Food (Groceries) Stores-management
 6012 Food (Specialty) Stores - management
 6031 Pharmacies-management
 6032 Patent Medicine and Toiletries Stores - management
 6111 Shoe Stores-management
 6121 Men's Clothing Stores-management
 6131 Women's Clothing Stores -management
 6141 Clothing Stores n.e.c -management
 6151 Fabric and Yam Stores -management
 6211 Household Furniture Stores (With Appliances and Furnishings) -management
 6212 Household Furniture Stores (Without Appliances and Furnishings)-management
 6213 Furniture Refinishing and Repair Shops - management
 6221 Appliance, Television, Radio and Stereo Stores - management

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6223 Appliance, Television, Radio and Stereo Rep-- Shops - management
6231 Floor Covering Stores - management
6232 Drapery Stores - management
6239 Other Household Furnishing Stores - management
6311 Automobile (New) Dealers -management
6312 Automobile (Used) Dealers -management
6321 Motor Home and Travel Trailer Dealers - management
6322 Boats, Outboard Motors and Boating Accessories Dealers-management
6323 Motorcycle and Snowmobile Dealers - management
Recreational Vehicle Dealers - management
6331 Gasoline Service Stations-management
6341 Home and Auto Supply Stores - management
6342 Tire, Battery, Pans and Accessories Stores - management
6351 Garages (General Repair)
6352 Paint and Body Repair Shops
6353 Muffler Replacement Shops
6354 Motor Vehicle Glass Replacement Shops
6355 Motor Vehicle Transmission Repair and Replacement Shops
6359 Other Motor Vehicle Repair Shops
6391 Car Washes -management
6399 Other Motor Vehicle Services n.e.c. - management
6411 Department Stores - management
6412 General Stores -management
6513 Other General Merchandise Stores
6521 Florist Shops - management
6522 Lawn and Garden Centres - management
6531 Hardware Stores - management
6532 Paint, Glass and Wallpaper Stores - management
6541 Sporting Goods Stores - management
6542 Bicycle Shops - management
6551 Musical Instrument Stores - management
6552 Record and Tape Stores -management
6561 Jewellery Stores - management
6562 Watch and Jewellery Repair Shops - management
6571 Camera and Photographic Supply Stores - management
6581 Toy and Hobby Stores - management
6582 Gift, Novelty and Souvenir Stores - management
6591 Second Hand Merchandise Stores n.c.c. - management
6592 Opticians' Shops -management
6593 Art Galleries and Artists' Supply Stores - management
6594 Luggage and Leather Goods Stores - management
6595 Monument and Tombstone Dealers - management
6596 Pet Stores - management
6597 Coin and Stamp Dealers - management
6598 Mobile Home Dealers - management
6599 Other Retail Stores n.e.c. -management
6911 Vending Machine Operators
6921 Direct Sellers
Division K - Finance and Insurance Industries
7211 Investment (Mutual Funds)-managed by insurance co.
7212 Retirement Savings Funds - managed by insurance co.
7213 Segregated Funds -managed by insurance co.
7291 Trusteed Pension Funds - managed by insurance co.
7311 Life Insurers
73311 ealth Insurers
7339 Other Property and Casualty insurers
7499 Other Financial Intermediaries n.e.c. — franchising
Division L -Real Estate Operator and Insurance Agent Industries
7511 Operators of Residential Buildings and Dwellings
7512 Operators of Non-Residential Buildings
7599 Other Real Estate Operators
7611 Insurance and Real Estate Agencies
Division M - Business Service industries
7711 Employment Agencies
7712 Personnel Suppliers
7721 Computer Services
7722 Computer Equipment Maintenance and Repair
7731 Offices of Chartered and Certified Accountants
7739 Other Accounting and Bookkeeping Services
7741 Advertising Agencies
7742 Media Representatives
7743 Outdoor Display and Billboard Advertising
7749 Other Advertising Services
7751 Offices of Architects
7752 Offices of Engineers
7759 Other Scientific and Technical Services
7771 Management Consulting Services
7791 Security and Investigation Services
7792 Credit Bureau Services
7793 Collection Agencies
7796 Duplicating Services
7799 Other Business Services n.e.c.
Division O - Educational Service Industries
8521 Post-Secondary Non-University Education - commercial
Division P- Health and Social Service Industries
8611 General hospitals-management
8612 Rehabilitation Hospitals -management
8613 Extended Care Hospitals -management
8614 Mental (Psychiatric) Hospitals - management
8615 Addiction hospitals-management
8616 Nursing Stations and Outpost Hospitals - management
8617 Children's Paediatric) Hospitals — management
8619 Other Specialty Hospitals - management
8631 Ambulance Services-management
8632 Drug Addiction and Alcoholism Treatment Clinics -management
8633 Health Rehabilitation Clinics - management
8634 Home Care Services (Including Home Nursing) -management
8635 Public Health ClinicsCommunity Health Centres - management
8654 Other Non-Institutional Health Services - management
8651 Office of Physicians, General Practice - management
8652 Offices of Physicians and Surgeons, Specialists -management
8653 Offices of Dentists, General Practice - management
8654 Offices of Dentists, Specialists - management
6611 Offices of Chiropractors and Osteopaths -management
8662 Offices of Nurses, Registered - management
8663 Offices of Nurses, Practical -management
8664 Offices of Nutritionists/Dietitians — management
8665 Offices of PhysiotherapistsOccupational Therapists -management
8666 Offices of Optometrists - management
8667 Offices of Podiatrists and Chiroprodists - management
8668 Offices of Detturists - management
8669 Offices of Other Health Practitioners - management
8671 Offices of Psychologists-management
8672 Offices of Social Workers - management
8679 Offices of Other Social Service Practitioners - management
8681 Medical Laboratories - commercial
8682 Radiological Laboratories - commercial
8683 Combined Medical and Radiological Laboratories - commercial
8684 Public Health Laboratories - commercial
8695 Blood Bank Laboratories - commercial
8689 Other Health Laboratories - commercial
Division Q - Accommodation, Food and Beverage Service Industries
9111 Hotels and Motor Hotels - management
9112 Motels -management
9113 Tourist Courts and Cabins - management
9114 Guest Houses and Tourist Homes - management
9211 Restaurants, Licensed
9212 Restaurants, Unlicensed (Including Drive-Ins)
9213 Take-Out Food Services
9214 Caterers
Division R - Other Service Industries
9725 Linen Supply
9911 Industrial Machinery and Equipment Rental and Leasing
9912 Audio-Visual Equipment Rental and Leasing
9913 Office Furniture and Machinery Rental and Leasing
9914 Other Machinery and Equipment Rental and Leasing
9921 Automobile and Truck Rental and Leasing Services
9942 Welding
9949 Other Repair Services n.e.c
9951 Disinfecting and Exterminating Services
99529953 Janitorial Services
9959 Other Services to Buildings and Dwellings
9999 Other Services n.e.c.